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MEMO ENDORSED

March 28, 2018

BY ECF

Honorable Barbara Moses
United States Magistrate Judge
United States Courthouse
500 Pearl Street, Room 740
New York, New York 10007-1312

APPLICATION GRANTED


Barbara Moses, U.S.M.J.

3/29/18

Re: Twanya McKinley v. Nancy A. Berryhill, Acting Commissioner
of Social Security, 1:17-cv-06439-BCM

Dear Judge Moses:

Seward & Kissel represents Twanya McKinley, the Plaintiff in this action. We write respectfully to request an extension of the deadline for Plaintiff to file her brief in support of her Cross Motion for Judgment on the Pleadings and in opposition to the Defendant's Motion for Judgment on the Pleadings (the "Plaintiff's Response") by thirty days.

Pursuant to the Standing Order "Motions for Judgment on the Pleadings in Social Security Cases," 16-MC-0171 dated August 28, 2017, Plaintiff's Response is currently due on April 9, 2018 – 60 days after the Defendant filed its Motion for Judgment on the Pleadings. However, due to workload restraints and the abbreviated duration of our representation of Plaintiff, we respectfully request a thirty day extension in order to have adequate time to complete Plaintiff's response. The Plaintiff has not previously requested an extension for the deadline to file her Response and Defense counsel has kindly consented to this request. This would extend our deadline to file to May 9, 2018 and correspondingly extend the date Defense counsel has to file a reply, if any, to May 30, 2018.

Thank you for your consideration of this matter.

Respectfully submitted,

SEWARD & KISSEL LLP

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